

OCT 22 2021

JULIA C. DUDLEY, CLERK
BY: DEPUTY CLERK
dudley

FAX COVER SHEET

TO CHRISTOPHER CANTWELL 00991-509
COMPANY Grady County Law Enforcement Center
FAX NUMBER 14058256100
FROM Kaplan Hecker Fink LLP
DATE 2021-10-15 15:06:25 GMT
RE SINES V. KESSLER: LEGAL MAIL FROM OPPOSING
COUNSEL

COVER MESSAGE

Mr. Cantwell,

Enclosed please find confidential legal materials from Tuesday's call.

Best,
Michael L. Bloch

These go with my objection
~~To Experts~~ Motion to
Exclude Experts Dated
10-17-21

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118
TEL (212) 763-0883 | FAX (212) 564-0883
WWW.KAPLANHECKER.COM

DIRECT DIAL 929-367-4573
DIRECT EMAIL mbloch@kaplanhecker.com

October 13, 2021

BY FAX

ATTENTION:

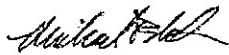
Christopher Cantwell 00991-509
Grady County Law Enforcement Center
215 N. 3rd St.
Chickasha, OK 73018
Fax: 405-224-5044

Re: Sines, et al. v. Kessler, et al., 17 Civ. 0072 (NKM)
LEGAL MAIL FROM OPPOSING COUNSEL - PLEASE DELIVER PROMPTLY

Mr. Cantwell:

Enclosed, please find confidential legal documents pertaining to yesterday's call.

Best,



Michael Bloch

Expert Report of Kathleen Blee
(Distinguished Professor of Sociology and Bailey Dean of the Dietrich School of Arts and Sciences,
University of Pittsburgh)
and Peter Simi (Associate Professor of Sociology, Chapman University)
July 21, 2020

Sines v. Kessler, No. 17-cv-00072

CONFIDENTIAL UNDER PROTECTIVE ORDER

[REDACTED VERSION]

Certain Redactions Removed 10/12/2021 pursuant to the Protective Order

- The *DailyStormer* proclaimed: “**N**ext stop **C**harlottesville.
Final Stop: **A**uschwitz.”²²¹
- On the Saturday of Unite the Right, when marchers were walking past a synagogue in Charlottesville while services were being held inside, their chants were directly linked to the Holocaust.²²² From a description by one of the congregants in the synagogue: “Several times, parades of Nazis passed our building, shouting, ‘There’s the synagogue!’ followed by chants of ‘Sieg Heil’ and other antisemitic language. Some carried flags with swastikas and other Nazi symbols.”²²³
- Richard Spencer’s AltRight.com published an article claiming: “Holocau\$t [sic] is designed to make you feel guilty whenever you criticize the Jews. Everyone knows that noticing their subversive tendencies leads directly to Auschwitz.”²²⁴
- On a podcast David Matthew Parrott laid out a plan to eliminate non-whites, by trapping them in an “Artificial Auschwitz supplying them with video games and addictive substances until they die off in what he calls the “Jewel Quest Genocide.”²²⁵

²²¹ Benjamin Garland, Charlottesville 2.0: Be There or Be Square, Daily Stormer (Aug 5, 2017), NOCUSTODIAN00020010.

²²² Sandi Bachom, Charlottesville Nazis Chant ‘Jews Will Not Replace Us’ Through Streets of #CVille 8/12/17, YouTube (Aug 15, 2017), BACHOM00000159

²²³ Second Amended Complaint, p. 65; Dahlia Lithwick, “Drowning Out Hate,” *State*, August 17, 2019; Alan Zimmerman, “In Charlottesville the Local Jewish Community Presses On,” *Reform Judaism* (August 14, 2017), https://reformjudaism.org/blog/2017/08/14/charlottesville-local-jewish-community-presses?utm_source=Share&utm_medium=social&utm_campaign=BlogPost&utm_content=Zimmerman.

²²⁴ Vincent Law, 5 Things I Learned In Kindergarten That I Had To Unlearn Later On In Life, AltRight.com, <https://altright.com/2017/07/31/5-things-i-learned-in-kindergarten-that-i-had-to-unlearn-later-on-in-life/>.

²²⁵ Dino et al. GoyTalk LIVE – Why Don’t They Go Back? Ft. Matt Parrott, Vanguard Streaming (July 19, 2019) at 1:13:18–1:15:00, NOCUSTODIAN00033348.

[REDACTED] Tyrone, someone who appears to have communicated with Defendants on Discord, posted that “This is a civilization of all conflict. It’s not American Genocide, it’s White Genocide.”²¹³

Likewise, Discord servers associated with Defendants also contained posts that explicitly infused a sense of urgency into perceived threats to the dominance of the white race. These posts continued a long WSM cultural history of positioning the fight against perceived enemies as immediately necessary. The IE Server, in which only members of IE were permitted to post²¹⁴, carried such messages, which we believe would have most likely been interpreted as threats to the white race in the WSM culture of Discord. As examples:

“We’re 100% in the end times”²¹⁵

“@Rsolobo/Rsolobo#9876 I thinks so too. Europe is almost lost”²¹⁶

“pedophilia is rampant in upper echelons”²¹⁷

“human sacrifices”²¹⁸

“drinking child blood”²¹⁹

Other Discord users and UTR attendees echoed Defendants’ sentiments. For example, a user who went by the Discord handle “Munich” posted: “Hi goye, first big pre-planned [sic] even I’m going to be part of, just wanted to say its going to be a pleasure fighting for the white race alongside all of you.”²²⁰ Another Discord user called “Johnny O’Matley” posted on August 11, 2017, “Everyone let’s get a good night sleep and remember why we are here To save the white race.”²²¹ Similarly, a Discord user called “Gavius Corvus” declared that “We’re fighting for the very survival of our race. Everyone needs to ask themselves what they’re willing to suffer for their people, because if the answer isn’t ‘anything’ you need to reevaluate your conviction.”²²²

The memo below suggests that a true commitment to the WSM as expressed through physical fitness also involves learning about aspects of history related to Nazi Germany and thinking of this past history as a model for the future race war where the white race will “secure” its existence.²²³

²¹³ Charlottesville 2.0, #gear_and_attire, Tyrone#4532, 2017-06-08 (6:21 pm UTC), DISCORD-0008257.

²¹⁴ Alduino Deposition Transcript, December 3, 2018, at 135:9-16.

²¹⁵ Identity Evropa KY/TN, #general, Rsolobo#9876, 2017-06-06 (4:21 pm UTC), DISCORD-0006396.

²¹⁶ Identity Evropa KY/TN, #general, RevStench#3208, 2017-06-06 (4:22 pm UTC), DISCORD-0006396.

²¹⁷ Identity Evropa KY/TN, #general, Rsolobo#9876, 2017-06-06 (4:22 pm UTC), DISCORD-0006396.

²¹⁸ Identity Evropa KY/TN, #general, Rsolobo#9876, 2017-06-06 (4:22 pm UTC), DISCORD-0006396.

²¹⁹ Identity Evropa KY/TN, #general, Rsolobo#9876, 2017-06-06 (4:22 pm UTC), DISCORD-0006396.

²²⁰ Charlottesville 2.0, #general_1, Gavius Corvus#7031, 2017-08-07 (8:54 pm UTC), DISCORD-0008235.

²²¹ Charlottesville 2.0/#leadership_discussion, 2017-08-02, DISCORD-0008290.

²²² Charlottesville 2.0/#general_1, 8/7/2017, DISCORD-0008235.

²²³ Charlottesville 2.0 Server, #dc_va_md, AllRight/v#7513, 2017-06-05 (11:55 pm UTC), DISCORD-0008246